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BroadBand Office Communications, Inc :
Petition for Waiver from the Requirements : 00-0750
Of 83 Illinois Administrative Code Sections :
725.500(o) and 725.620(b). : *Report*

CHIEF CLERK'S OFFICE

SUPPLEMENTAL INFORMATION

NOW COMES BroadBand Office Communications, Inc., (BBOC), by and through its attorneys, Sorling, Northrup, Hanna, Cullen, and Cochran, Ltd, Charles J. Northrup of Counsel, pursuant to Illinois Administrative Code Part 200 and Illinois Administrative Code Section 725.101, and submits this filing in support of its petition for a temporary waiver from compliance with the requirements of 83 Illinois Administrative Code Section 725.500(o) and Section 725.620(b). The following information supplements BBOC's initial petition:

1. Paul Gallant, on behalf of BBOC, testified before Hearing Examiner Albers on Thursday, April 25, 2001. His verbal testimony confirmed and supplemented the written testimony of Kathleen Abernathy (who resigned from BBOC to take a position with the F.C.C.) concerning BBOC's petition for a temporary waiver of the requirements of 83 Illinois Administrative Code Sections 725.500(o) and 725.620(b). Those rules require a carrier to deploy a callbox on the outside of its switching office so that authorized emergency personnel can receive 911 calls from that carrier's customers in the event that the carrier's switching office becomes isolated from the rest of the network.

2. At the hearing, Mr. Gallant testified that BBOC has a switch deployed at 427 South LaSalle Street in Chicago, Illinois. BBOC is not currently providing service using that switch because BBOC has not yet been allocated telephone numbers for that particular territory.

However, Mr. Gallant noted that BBOC has tested and provisioned two diverse paths between its switch and the two Ameritech 911 tandem switches serving Chicago. Mr. Gallant stated that within each path is a T1 trunk dedicated to 911 calls. Mr. Gallant further testified that such T1 was the only trunk within each path dedicated to 911 service.

3. Commission Staff explained that it had supported other carriers' requests for waivers of the callbox requirement only if a carrier had deployed two trunks for 911 service within each path. Mr. Gallant stated that, following the hearing, he would confirm that BBOC's 911 architecture in fact contained only one such trunk within each path, and that he would file this supplemental motion confirming or clarifying BBOC's precise 911 network architecture. In the event BBOC had only one 911 trunk within each path, BBOC's supplemental filing would further address whether it intended to install a second trunk in response to Staff's position.

4. BBOC now furnishes the following information to supplement and clarify Mr. Gallant's testimony regarding BBOC's 911 network topology in Chicago. BBOC hereby confirms that BBOC has provisioned *two* DS0 trunks dedicated to 911 service within each of the two paths running between its switch and an Ameritech 911 tandem.

5. BBOC believes that the deployment of the two individual DS0 trunks within each path comports with Staff's view, as expressed at the April 25, 2001 hearing, of the necessary network arrangements necessary to qualify for a temporary waiver of the callbox requirements.

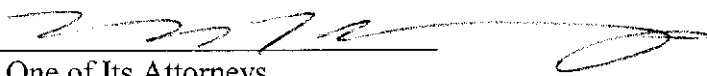
6. BBOC would also note that its redundant 911 architecture actually exceeds industry guidelines for 911 networking. The National Emergency Number Association (NENA) issued its "National Quality Assurance" guidelines (NENA-03-001) on June 12, 1995. Those guidelines recommend that a carrier have two trunks dedicated to 911 traffic per 10,000 active

access lines. BBOC has actually deployed *four* trunks dedicated to 911 service even before connecting a single access line to its switch in Chicago.

Wherefore, on the basis of the BBOC's initial petition for waiver, Mr. Gallant's testimony, and the new information in the instant pleading, BBOC respectfully requests that the Commission grant BBOC a waiver of Sections 725.500(o) and 725.620(b) of the Illinois Administrative Code regarding the installation of callboxes for one year from the date the final order is entered in this docket.

Respectfully submitted,

BroadBand Office Communications, Inc.

By: 
One of Its Attorneys

Sorling, Northrup, Hanna, Cullen and Cochran, Ltd.
Charles J. Northrup, Of Counsel
Suite 800 Illinois Building
P.O. Box 5131
Springfield, IL 62705
Telephone: 217-544-1144

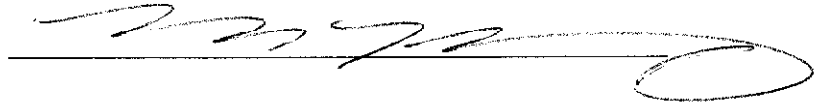
PROOF OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served by hand delivery to:

Mr. John Albers
Hearing Officer
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701

Ms. Stacy Buecker
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701

on the 29th day of May, 2001, with postage fully prepaid.



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